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March 3, 2025

VIA E-MAIL

Honorable Lisa J. Cisneros
Northern District of California
San Francisco Courthouse, Courtroom G – 15th Floor
450 Golden Gate Ave.
San Francisco, CA 94102

RE: *In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, Case No. 3:23-md-03084-CRB (LJC)

Dear Judge Cisneros:

We write on behalf of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Uber”) to advise the Court that, with Plaintiffs’ consent, Uber is filing a corrected version of Uber’s Motion for a Protective Order (ECF No. 2425) and the [Proposed] Order Granting Defendants’ Motion for Protective Order (ECF No. 2425-2). The corrected versions of those documents include the following changes:

Changes to Defendants’ Motion for a Protective Order (ECF No. 2425)

Page/Line	Changes
1, line 10	add “addresses” between “also” and “Plaintiffs”
6, line 15	replace “4” with “3”
6, line 27	replace “scheduling” with “schedul[ing]”
9, lines 12–13	replace “Senior Manager, Central Operations” with “Director, Safety Access & Identity”
11, line 15	replace “courts” with “[c]ourts”
13, line 10	add “(in the JCCP)” between “Andi Pimentel” and “,”
21, line 9	replace “and” between “Vice President” and “Head” with “,”
23, line 7	add “(in the JCCP)” between “Phillip Cardenas” and “,”
24, line 18	replace “Plaintiffs” with “Plaintiffs”
24, line 24	replace “The Court ‘must limit’ discovery if its ‘burden or expense . . . outweighs its likely benefit.’ Fed. R. Civ. P. 26(b)(2)(C).” with “The Court ‘must limit’ such discovery. <i>See</i> Fed. R. Civ. P. 26(b)(2)(C).”

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Changes to [Proposed] Order Granting Defendants' Motion for Protective Order (ECF No. 2425-2)

Page	Changes
1	add "to" between "pursuant" and "Federal"
1	add "Frank Chang" between "Sachin Kansal" and "Ryan Graves"

Respectfully submitted,

/s/ Robert A. Atkins

Robert A. Atkins

cc: Roopal Luhana
Sarah R. London
Rachel B. Abrams
Co-Lead Counsel for Plaintiffs